

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth, ERS, and PBA.**

ORDER GRANTING THREE HUNDRED SIXTY-NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF PUERTO RICO, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO SUBSEQUENTLY AMENDED CLAIMS

Upon the *Three Hundred Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Subsequently Amended Claims* [ECF No. 17915] (the “Three Hundred Sixty-Ninth Omnibus Objection”)<sup>2</sup> filed

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Sixty-Ninth Omnibus Objection.

by the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth and ERS, the “Debtors”), dated August 20, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Three Hundred Sixty-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Sixty-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Sixty-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Three Hundred Sixty-Ninth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Three Hundred Sixty-Ninth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Sixty-Ninth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Sixty-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims on any grounds whatsoever is reserved; and it is further

ORDERED that Prime Clerk is authorized and directed to designate as expunged the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 17915 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Three Hundred Sixty-Ninth Omnibus Objection**

Three Hundred and Sixty-Ninth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1 BAEZ CRUZ, NILDA CALLE LIMA 353 ROLLING HILLS CAROLINA, PR 00987	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	82145	\$ 7,000.00*	BAEZ CRUZ, NILDA CALLE LIMA 353 ROLLING HILLS CAROLINA, PR 00987	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	73223	\$ 7,000.00*

Reason: Amended and superseded by a later filed Proof of Claim.

2 CASIANO JUSINO, HAROLD DAMARIS QUINONES VARGAS P O BOX 429 CABO ROJO, PR 00623	04/12/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	6418^	\$ 343,704.56*	CASIANO JUSINO, HAROLD DAMARIS QUINONES VARGAS PO BOX 429 CABO ROJO, PR 00623	07/08/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179441	\$ 26,943.40*
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Reason: Amended and superseded by a later filed Proof of Claim.

^ Claim #6418 also contained on Exhibit A to the 345th Omnibus Claims Objection for Misclassified Claims

3 COOPERATIVA A/C VEGABAJENA PO BOX 4622 VEGA BAJA, PR 00694	05/25/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	26707	\$ 16,716.50	COOPERATIVA A/C VEGABAJENA PO BOX 4622 VEGA BAJA, PR 00694	07/16/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	97078^	\$ 25,000.00
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Reason: Amended and superseded by a later filed Proof of Claim.

^ Claim #97078 also contained on Exhibit A to the 389th Omnibus Claims Objection for Claims to Be Disallowed

4 COOPERATIVA A/C VEGABAJENA PO BOX 4622 VEGA BAJA, PR 00694	07/02/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	79353	\$ 8,091.42	COOPERATIVA A/C VEGABAJENA SORY ADROVET, COLLECTION DEPARTMENT MANAGER PO BOX 4622 VEGA BAJA, PR 00694	07/25/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	154658^	\$ 8,091.42*
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Reason: Amended and superseded by a later filed Proof of Claim.

^ Claim #154658 also contained on Exhibit A to the 389th Omnibus Claims Objection for Claims to Be Disallowed

Three Hundred and Sixty-Ninth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5 COOPERATIVA DE AHORRO Y CREDITO ABRAHAM ROSA I/C/O ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	53780	\$ 31,173,444.00	COOPERATIVE DE AHORRO Y CREDITO ABRAHAM ROSA ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 191757 SAN JUAN, PR 00919-1757	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169510	\$ 17,827,609.00
Reason: Amended and superseded by a later filed Proof of Claim.									
6 COOPERATIVA DE AHORRO Y CREDITO DE CIALES ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	29527	\$ 23,803,677.95	COOPERATIVA DE AHORRO Y CREDITO DE CIALES ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169491	\$ 22,944,604.00
Reason: Amended and superseded by a later filed Proof of Claim.									
7 COOPERATIVA DE AHORRO Y CRÉDITO DE JUANA DÍAZ ATTN: ENRIQUE M. ALMEIDA BERNAL, ESQ PO BOX 19757 SAN JUAN, PR 00919-1757	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	31421	\$ 9,631,043.61	COOPERATIVA DE AHORRO Y CRÉDITO DE JUANA DÍAZ ATTN: ENRIQUE M. ALMEIDA BERNAL, ESQ PO BOX 19757 SAN JUAN, PR 00919-1757	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169507	\$ 3,269,189.00
Reason: Amended and superseded by a later filed Proof of Claim.									
8 COOPERATIVA DE AHORRO Y CREDITO DE LARES PO BOX 191757 SAN JUAN, PR 00919	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	52616	\$ 10,465,107.00	COOPERATIVA DE AHORRO Y CREDITO DE LARES PO BOX 191757 SAN JUAN, PR 00919	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169511	\$ 7,289,615.00
Reason: Amended and superseded by a later filed Proof of Claim.									

Three Hundred and Sixty-Ninth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
9 COOPERATIVA DE AHORRO Y CREDITO DE RINCON ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	36224	\$ 127,212,213.00	COOPERATIVA DE AHORRO Y CREDITO DE RINCON ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169512	\$ 32,956,914.00
Reason: Amended and superseded by a later filed Proof of Claim.									
10 COOPERATIVA DE AHORRO Y CREDITO DR. MANUEL ZENO GANDIA ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	29458	\$ 40,565,289.00	COOPERATIVA DE AHORRO Y CREDITO DR. MANUEL ZENO GANDIA ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169493	\$ 16,549,461.00
Reason: Amended and superseded by a later filed Proof of Claim.									
11 COOPERATIVA DE AHORRO Y CREDITO VEGA ALTA ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	05/24/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	25601	\$ 46,654,701.70*	COOPERATIVA DE AHORRO Y CREDITO VEGA ALTA ENRIQUE M. ALMEIDA BERNAL, ESQ. PO BOX 19757 SAN JUAN, PR 00919-1757	07/03/19	17 BK 03283-LTS / Commonwealth of Puerto Rico	169494	\$ 19,753,068.00
Reason: Amended and superseded by a later filed Proof of Claim.									
12 DIAZ MIRANDA, ZORAIDA HC-01 BOX 5352 COROZAL, PR 00783	07/02/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	152861	Undetermined*	DIAZ MIRANDA, ZORAIDA HC-1 BOX 5352 COROZAL, PR 00783	06/03/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179298	\$ 34,800.00
Reason: Amended and superseded by a later filed Proof of Claim.									
13 FINANCIAL GUARANTY INSURANCE COMPANY DEREK M. DONNELLY 463 SEVENTH AVENUE NEW YORK, NY 10018	07/29/20	19-BK-05523-LTS / Puerto Rico Public Buildings Authority (PBA)	174409	\$ 2,303,553.55*	FINANCIAL GUARANTY INSURANCE COMPANY DEREK M. DONNELLY 463 SEVENTH AVENUE NEW YORK, NY 10018	07/30/20	19-BK-05523-LTS / Puerto Rico Public Buildings Authority (PBA)	174671	\$ 2,303,553.55*
Reason: Amended and superseded by a later filed Proof of Claim.									



Three Hundred and Sixty-Ninth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
14 GUBECOOP PO BOX 41235 SAN JUAN, PR 00940-1235	06/11/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	45648	\$ 7,424.19	GUBECOOP PO BOX 41235 SAN JUAN, PR 00940-1235	07/17/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	115206^	\$ 7,424.19
Reason: Amended and superseded by a later filed Proof of Claim.									
^ Claim #115206 also contained on Exhibit A to the 389th Omnibus Claims Objection for Claims to Be Disallowed									
15 MALDONADO NEGRON, MARIANO HC 2 BOX 7940 GUAYANILLA, PR 00656- 9764	05/25/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	29794	Undetermined*	MALDONADO NEGRON, MARIANO 4958 SW 166TH COURT RD OCALA, FL 34481	01/10/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	173013^	\$ 15,000.00*
Reason: Amended and superseded by a later filed Proof of Claim.									
^ Claim #173013 also contained on Exhibit A to the 377th Omnibus Claims Objection for Claims to Be Disallowed									
16 MARRERO FRANCO, DINORA WILDA PO BOX 48 JUANA DIAZ, PR 00795	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	146334	Undetermined*	MARRERO FRANCO, DINORA WILDA PO BOX 48 JUANA DÍAZ, PR 00795	07/06/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179435	\$ 40,800.00
Reason: Amended and superseded by a later filed Proof of Claim.									
17 MEDINA VELEZ, IRIS D. URB. CRISTAL #2285 AGUADILLA, PR 00603	05/30/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	45160	Undetermined*	MEDINA VELEZ, IRIS D. URB.CRISTAL #228 AGUADILLA, PR 00603	06/22/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179415^	\$ 60,000.00*
Reason: Amended and superseded by a later filed Proof of Claim.									
^ Claim #179415 also contained on Exhibit A to the 378th Omnibus Claims Objection for Claims to Be Disallowed									
18 MORALES VAZQUEZ, MARINA ESTHER CALLE CANARIO BUZON 135 REPARTO SAN JOSE CAGUAS, PR 00727	05/01/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	11179	Undetermined*	MORALES VAZQUEZ, MARINA E. CONDOMINIO LOS PINOS APARTAMENTO 1001 BUZON 323 CAGUAS, PR 00725	06/28/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179436	\$ 70,000.00
Reason: Amended and superseded by a later filed Proof of Claim.									

Three Hundred and Sixty-Ninth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
19	PEREZ, WILLIAM JUAN P RIVERA, ESQ. PO BOX 7498 PONCE, PR 00732	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	164461	\$ 500,000.00*	PEREZ, WILLIAM NOREEN WISCOVITCH, CHAPTER 7 TRUSTEE, BANKR. ESTATE OF WILLIAM PEREZ SALAS, CASE NO. 20-04508, PMB 136 400 CALLE JUAN CALAF SAN JUAN, PR 00918	05/14/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179235	\$ 500,000.00*
Reason: Amended and superseded by a later filed Proof of Claim.										
20	RAMIREZ SOTO, RAFAEL HC03 BOX 34848 SAN SEBASTIAN, PR 00685	06/28/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	67460	Undetermined*	RAMIREZ SOTO, RAFAEL HC03 BOX. 34848 SAN SEBASTIÁN, PR 00685	07/03/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	43270	Undetermined*
Reason: Amended and superseded by a later filed Proof of Claim.										
21	SANTIAGO MARCANO, VICTOR HC 03 BOX 6825 JUNCOS, PR 00777	01/15/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179038	Undetermined*	SANTIAGO MARCANO, VICTOR HC-03 BOX 6825 JUNCOS, PR 00777	05/18/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179242^	\$ 60,000.00
Reason: Amended and superseded by a later filed Proof of Claim.										
^ Claim #179242 also contained on Exhibit A to the 383rd Omnibus Claims Objection for Claims to Be Disallowed										
22	SCOTIABANK DE PUERTO RICO MURPHY & MCGONIGLE, PC ATTN: CAMERON S. MATHESON 4870 SADLER ROAD, SUITE 301 GLEN ALLEN, VA 23060	07/27/20	19-BK-05523-LTS / Puerto Rico Public Buildings Authority (PBA)	174304	Undetermined*	SCOTIABANK DE PUERTO RICO MURPHY & MCGONIGLE ATTN: CAMERON S. MATHESON 4870 SADLER ROAD, SUITE 301 GLEN ALLEN, VA 23060	08/04/20	19-BK-05523-LTS / Puerto Rico Public Buildings Authority (PBA)	174514	Undetermined*
Reason: Amended and superseded by a later filed Proof of Claim.										